

Barry N. Gutterman, Esq. (BG6410)  
Robert Briere, Esq. (RB6080)  
Barry N. Gutterman & Associates, P.C.  
Attorneys for Defendant  
Yang Ming Marine Transport Corporation  
60 East 42nd Street, 46th Floor  
New York, New York 10165  
(212) 983-1466

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

-----X  
SOMPO JAPAN INSURANCE COMPANY OF AMERICA,  
and SOMPO JAPAN INSURANCE, INC.

*Plaintiffs,*

- against -

YANG MING MARINE TRANSPORT CORPORATION

*Defendant.*  
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**07 CIV. 11276**

**(Judge Chin)**

**MOTION TO ADMIT  
COUNSEL  
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Barry N. Gutterman, a member in good standing of the bar of this Court, hereby moves for an Order allowing the admission pro hac vice of

Applicant's Name: Paul D. Keenan, Esq.  
Firm Name: Keenan Cohen & Howard P.C.  
Address: One Pitcairn Place, Suite 2400  
City/State/Zip: Jenkintown, PA 19046  
Phone Number: (215) 609-1110  
Fax Number: (212) 609-1117  
Email Address: [pkeenan@freightlaw.net](mailto:pkeenan@freightlaw.net)

Paul D. Keenan is a member in good standing of the Bar of the State(s) of Pennsylvania.  
Pennsylvania Bar #: 30262.


There are no pending disciplinary proceedings against Paul D. Keenan in any State or Federal court.

FILED  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
2008 APR 30 PM 3:01

APR 30 2008

Dated: April 25, 2008  
New York, New York

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Barry N. Gutterman", written over a horizontal line.

Barry N. Gutterman

SDNY Bar #:	BG 6410
Firm Name:	Barry N. Gutterman & Associates, P.C.
Address:	60 East 42 <sup>nd</sup> Street, 46 <sup>th</sup> Floor
City:	New York
State:	New York
Zip Code:	10165
Phone Number:	(212) 983-1466
Fax Number:	(212) 983-1229

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SOMPO JAPAN INSURANCE COMPANY OF  
AMERICA, and SOMPO JAPAN INSURANCE, INC.

*Plaintiffs,*

- against -

YANG MING MARINE TRANSPORT CORPORATION  
*Defendant*

**ECF CASE**

**07 CIV. 11276  
(Judge Chin)**

**AFFIDAVIT OF BARRY  
GUTTERMAN IN SUPPORT  
OF MOTION TO ADMIT  
COUNSEL PRO HAC VICE**

State of New York     )  
                                      ) ss:  
County of New York    )

Barry N. Gutterman, being duly sworn, hereby deposes and says as follows:

1. I am counsel for Defendants Yang Ming Marine Transport Corporation (“Defendant”) in the above captioned case. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of the Defendants’ motion to admit Paul D. Keenan as counsel pro hac vice to represent the Defendants in this matter.
2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in August 1987. I am also admitted to the bar of the United States District Court for the Southern District of New York and am in good standing with this Court.
3. I have known Paul D. Keenan since 1982.

4. Mr. Keenan is a partner in the firm of Keenan Cohen & Howard P.C.,  
Jenkintown, Pennsylvania.
5. I have found Mr. Keenan to be a skilled attorney and a person of integrity. He is  
experienced in Federal practice and is familiar with the Federal Rules of  
Procedure.
6. Accordingly, I am pleased to move the admission of Paul D. Keenan pro hac vice.
7. I respectfully submit a proposed order granting the admission of Paul D. Keenan  
pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Paul D.  
Keenan pro hac vice to represent Defendant Yang Ming Marine Transport Corporation in  
the above-captioned matter be granted.

Dated: April 25, 2008  
New York, New York

ka

Sworn to before me on this  
25<sup>th</sup> date of April, 2008



**THEODORE P. KAPLAN**  
Notary Public State of New York  
No 02KA6016907  
Qualified in New York County  
Commission Expires November 30, 2010

Respectfully submitted,



Barry N. Gutterman  
SDNY Bar Code: BG 6410

# EXHIBIT A



Supreme Court of Pennsylvania

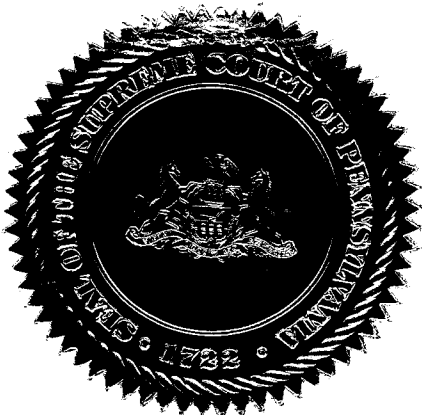
**CERTIFICATE OF GOOD STANDING**

***Paul David Keenan, Esq.***

**DATE OF ADMISSION**

***October 15, 1979***

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: April 17, 2008

A handwritten signature in black ink, reading "Patricia A. Johnson".

Patricia A. Johnson  
Chief Clerk

Barry N. Gutterman, Esq. (BG6410)  
Robert Briere, Esq. (RB6080)  
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Attorneys for Defendant  
Yang Ming Marine Transport Corporation  
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**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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and SOMPO JAPAN INSURANCE, INC.

*Plaintiffs,*

- against -

YANG MING MARINE TRANSPORT CORPORATION

*Defendant.*  
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**07 CIV. 11276**

**(Judge Chin)**

**ORDER FOR  
ADMISSION  
PRO HAC VICE  
ON WRITTEN  
MOTION**

Upon the motion of Barry N. Gutterman, attorney for Defendant Yang Ming Marine  
Transport Corporation ("Defendant") and said sponsor attorney's affidavit in support:

IT IS HEREBY ORDERED that

Applicant's Name: Paul D. Keenan, Esq.  
Firm Name: Keenan Cohen & Howard P.C.  
Address: One Pitcairn Place, Suite 2400  
City/State/Zip: Jenkintown, PA 19046  
Phone Number: (215) 609-1110  
Fax Number: (212) 609-1117  
Email Address: [pkeenan@freightlaw.net](mailto:pkeenan@freightlaw.net)

Is admitted to practice pro hac vice counsel for the Defendants in the above captioned  
case in the United States District Court for the Southern District of New York. All attorneys  
appearing before this Court are subject to the Local Rules of this Court, including the Rules  
governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF)

system, counsel shall immediately apply for an ECF password at [nyds.uscourts.gov](http://nyds.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: April \_\_\_\_, 2008  
New York, New York

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United States District Judge



STATE OF NEW YORK     )  
                                      :     ss.:  
COUNTY OF NEW YORK    )

Judd Hollander, affirms and says, that deponent is not a party to the action, is over 18 years of age and resides in New York, New York.

That on the 25th day of April, 2008 deponent served the within **MOTION FOR ADMISION PRO HAC VICE and ENTRY GRANTING MOTION FOR ADMISSION PRO HAC VICE. FOR PAUL D. KEENAN upon:**

Thomas M. Eagan, Esq. (TE1713)  
Maloof Browne & Eagan LLC  
411 Theodore Fremd Avenue, Suite 190  
Rye, New York 10580-1411  
(914) 921-1200 (phone)  
(914) 921-1023 (fax)

Attorneys for Plaintiffs

by depositing a true copy thereof in a post-paid wrapper, via regular mail, in an official depository under the exclusive care and custody of the United States Post Office within the State of New York addressed to each of the foregoing persons at the last known address set forth after each name.

  
\_\_\_\_\_  
Judd Hollander